

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DAILY NEWS, LP; CHICAGO TRIBUNE :  
COMPANY, LLC; ORLANDO SENTINEL : No. 1:24-cv-03285-SHS  
COMMUNICATIONS COMPANY, LLC; :  
SUN-SENTINEL COMPANY, LLC; SAN :  
JOSE MERCURY-NEWS, LLC; DP MEDIA :  
NETWORK, LLC; ORB PUBLISHING, :  
LLC; AND NORTHWEST :  
PUBLICATIONS, LLC, :  
:  
Plaintiffs, :  
:  
v. X

MICROSOFT CORPORATION, OPENAI,  
INC., OPENAI LP, OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC,

Defendants.

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**DECLARATION OF ANDREW L. PERITO  
IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

I, Andrew L. Perito, declare as follows:

1. I am an attorney at law licensed to practice in the state of California. I submit this Declaration in support of the motion to admit me *pro hac vice* before the United States District Court for the Southern District of New York to represent Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OPCO LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC in the above-captioned action.

2. I am a member in good standing at the bar of the state of California. A true and correct copy of my certificate of good standing issued by the Supreme Court of California within

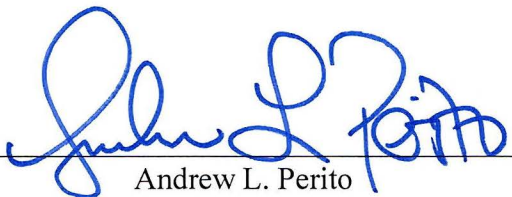
the past 30 days is attached hereto. There are no pending disciplinary proceedings against me in any state or federal court.

3. Pursuant to Local Rule 1.3(c), I state:

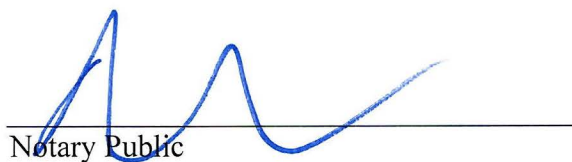
- a. I have never been convicted of a felony;
- b. I have never been censured, suspended, disbarred or denied admission or readmission by any court; and
- c. There are no disciplinary proceedings presently against me.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 15, 2024

  
Andrew L. Perito

Sworn and subscribed to before  
me this 15<sup>th</sup> day of August, 2024.

  
Notary Public

